

# **EXHIBIT B**

# Transcript of the Testimony of **Aileen Gonzalez**

June 17, 2025

Akari Johnson, ET AL. v. MMI 82, LLC, ET. AL.,



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1 Q Regardless of who drafted this document, are  
2 the statements made in your declaration true and  
3 accurate to the best of your knowledge?

4 A Yes.

5 Q Okay. Earlier today you mentioned that during  
6 your time working at Casa Morada, you were aware of  
7 some documents being destroyed. Can you elaborate a  
8 little bit more on that?

9 A It was just when we lost the storage house, I  
10 kept telling him that we needed to find a storage place  
11 or get storage in the hotel so that we could hold  
12 those. It was audits, employee information, things  
13 like that. They were just thrown into a dumpster.

14 Q What type of audits?

15 A Hotel audits, like end of night audits.

16 Q And what type of employee information was  
17 destroyed?

18 A Any applications, any previous employee  
19 information, if they were terminated, what they were  
20 terminated for, if they had a write-up, things like  
21 that.

22 Q Do you know if there were any time or pay  
23 records that were destroyed?

24 A Yes, everything was destroyed. We basically  
25 started new.

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1 Q Around that time that you lost or the hotel  
2 lost the storage house and those documents were  
3 destroyed. Can you give me an approximate timeframe?

4 A Of when they were -- when we lost the place?

5 Q Correct.

6 A That was in 2020 around November-ish.

7 Q Had you ever been to that storage house?

8 A Yes, everybody had.

9 Q About how often would you go there?

10 A Every day, at least four or five times a day.  
11 Mostly because laundry was attached there and if we  
12 needed things for the hotel, that's where we would  
13 store it.

14 Q So, you saw specifically what was being  
15 stored in that storage house?

16 A Yes.

17 Q And when were those documents destroyed?

18 A Same time in November, we had to be out of  
19 there.

20 Q Do you know if the documents that were  
21 destroyed included clock in and clock out records for  
22 the employees of the hotel?

23 A Yes.

24 Q Do you know if that included time records of  
25 current employees of the hotel?

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1           A     Some -- yes, there are some that have been  
2     there for years.

3           Q     Okay. Did those documents include pay records  
4     as well as time records?

5           A     Included everything, pay records, expense  
6     reports, everything for about seven years worth.

7           Q     Whose decision was it to destroy all those  
8     documents?

9           A     O'Neale's.

10          Q     How did O'Neale go about destroying those  
11     documents after he decided to destroy them?

12          A     We rented a dumpster and threw everything  
13     into the dumpster. So, it was records mixed with  
14     filing cabinets, mixed with furniture, mixed with --  
15     sorry, a whole bunch of different stuff.

16          Q     Do you know who rented the dumpster?

17          A     Casa Morada.

18          Q     Do you know which employee or individual  
19     associated with Casa Morada actually went about renting  
20     that dumpster?

21          A     I did.

22          Q     You did. At O'Neale's order?

23          A     Yes.

24          Q     Do you know the name of the company that Casa  
25     Morada rented the dumpster from?

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1 A Discount Rock & Sand.

2 Q So, was that just a one-time rental?

3 A For that time, yes.

4 Q Had Casa Morada done business with Discount  
5 Rock & Sand on other occasions other than --

6 A Yes.

7 Q -- that incident where --

8 A Yes.

9 Q For what type of situations would Casa Morada  
10 do business with Discount Rock & Sand?

11 A For our sand on the property, we ordered sand  
12 from them about two, maybe three times a year,  
13 depending on how bad the hurricane season was. And for  
14 dumpsters when we were doing renovations and things  
15 like that.

16 Q Was it customary for Casa Morada -- pardon  
17 me. Was it customary for Casa Morada to destroy its  
18 employees' time or pay records?

19 MR. NARULA: Object to form.

20 BY MR. LAROU:

21 Q You can answer.

22 A I don't know. That was the first time that I  
23 had been asked to get rid of anything.

24 Q Okay. Are there any other occasions that  
25 you're aware of Casa Morada destroying personnel

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1 estimate, was he working either before or after his  
2 schedule shift?

3 A Mostly after.

4 Q Mostly after. About how often?

5 A Couple of times a week.

6 Q Okay. Next, I want to go to Defendant's  
7 Exhibit 12 -- cards -- time cards. You can take a  
8 minute to look through these documents -- I'm sorry,  
9 this document if you need to. Was Akari required to  
10 punch in and out in the time clock system every shift  
11 you worked?

12 A Yes.

13 Q As far as you're aware, during the time that  
14 you were working in the hotel, is this the extent of  
15 Akari's time cards or were there more?

16 A There was way more.

17 Q There were way more?

18 A Yes.

19 Q Is there any reason that you can think that  
20 they wouldn't exist anymore?

21 MR. NARULA: Objection, form.

22 A I don't know.

23 BY MR. LAROU:

24 Q What would you do with the time cards after  
25 they were submitted to you?

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CERTIFICATE OF OATH

I, KHALED ELMOUSSA, Court Reporter, Notary Public,  
State of Florida, certify that AILEEN GONZALEZ personally  
appeared before me on the 17th day of June, 2025, and was  
duly sworn

Signed this 24th day of June 2025.

Khaled Elmoussa

KHALED ELMOUSSA, Court Reporter  
Notary Public, State of Florida  
Commission No. HH 566837  
Commission Expires: 6/30/28